

EXHIBIT A

DEFINITIONS

The term “document(s)” set forth in this request refers to all writings of any kind, including the originals and all nonidentical copies, whether different from the original by reason of any notation made on such copies or otherwise, including without limitation, correspondence; memoranda; notes; diaries; statistics; letters; materials; orders; directives; interviews; telegrams; minutes; reports; studies; statements; transcripts; summaries; pamphlets; books; interoffice and intraoffice communications; notations of any sort of conversations, telephone calls, meetings or other communications; bulletins; printed matter; teletype; telefax; worksheets; and all drafts, alterations, modifications, changed and amendments of any of the foregoing; graphic or aural recordings or representations of any kind including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, records, motion pictures; and electronic, mechanical, or electrical recordings or representations of any kind, including without limitation, tapes, cassettes, cartridges, discs, chips, electronic mail and records.

“STD” refers to short term disability.

“FMLA” refers to Family and Medical Leave Act.

“EDS” refers to Electronic Data Systems Corporation.

DOCUMENTS REQUESTED

1. All documents that refer or relate to Hestal Lipscomb’s attempts to obtain either STD benefits or FMLA leave in 2004 while employed by EDS.
2. All documents that identify or disclose information about documents received by facsimile number 800-325-1016 on June 21, 2004. This request includes, but is not limited to, any

logs, activity reports, confirmations, computer printouts or other means of recording information about the documents received by facsimile at that number.